

Butler, Jeff E. (Litigation-NY)

From: Amy Nemetz <anemetz@selendygay.com>
Sent: Tuesday, May 31, 2022 9:45 AM
To: Butler, Jeff E. (Litigation-NY); George, Meredith (Litigation-NY); Ron Krock
Cc: David Elsberg; Maria Ginzburg; Jordan Goldstein; Joshua Margolin; David Flugman; Meredith Nelson; Julie Singer; Samuel Kwak; Dominic Budetti; Tony Russo; Max Siegel
Subject: RE: [EXT] RE: Fairfield // Substantial Completion

Jeff and Meredith,

Thanks again for the call yesterday. We appreciate your client's willingness to consider producing additional information in response to our requests. Below please find our specific proposals and questions regarding additional discovery for Dexia BIL.

1. Emails

- a. Please tell us if your client preserved emails for the following custodians during the time frame 2000-2008:
 - Marie-Claire Meyers (*e.g.*, BIL000001, -12)
 - Sandy Goergen (*e.g.*, BIL000005)
 - Jeannot Reiter (*e.g.*, BIL000005)
 - Marie-Rose Biver (*e.g.*, BIL000035)
 - Linda Bernard (*e.g.*, BIL000005)
 - Maria Totaro (*e.g.*, BIL000011)
 - Karine [no last name listed] (*e.g.*, BIL000011)
 - Marco Mersch (*e.g.*, BIL000027)
 - Valerie [no last name listed] (Back Office) (*e.g.*, BIL000030, -39)
 - Sabrina Tosti (*e.g.*, BIL000035)
 - Marie-Anne Salentiny (*e.g.*, BIL000021, -39)
 - Chantal Reyter (*e.g.*, BIL000037)
 - Sabine Van Zanten (*e.g.*, BIL000039)
 - Audrey Zielkowski (*e.g.*, BIL000039)
 - Barbara Doering (*e.g.*, BIL000052)
 - Monique Kутten (*e.g.*, BIL000058)
 - Michelle Hawe (*e.g.*, BIL000074)
- b. We noticed some generic email recipients in BIL's productions – please tell us whether the following refer to general email inboxes or were listservs of individual employees:
 - "Reconciliation Cash" (*e.g.*, BIL000035)
 - "Brokerage Funds" (*e.g.*, BIL000035; BIL000047)
 - "Reconciliation Securities" (*e.g.*, BIL000058)
- c. Please tell us if your client is willing to review and produce emails from these custodians and general inboxes (assuming that's what they are) which hit on the following search terms:
 - BLMIS-Related Terms
 - BLM*

- BLMIS*
 - BMIS*
 - Madoff*
 - Bernie w/50 Fairfield
 - "split-strike" OR "split strike" OR "conversion strategy" OR SSC
 - Fund-Related Terms
 - Sentry
 - Sigma
 - Lambda
 - Fairfield* OR FGG OR FSL
 - Greenwich
 - "Fund Documents"
 - 103577 (Dexia Banque International Citco account number)
 - Agency-Related Terms
 - (Instruct* OR Agent OR Agency) w/30 (Redemption* OR Redeem* OR Subscription* OR Subscrib* OR Invest* OR Transfer* OR Switch*)
 - Correspondent Account Terms
 - HSBC w/10 ("New York" OR "NA")
 - MRMDUS33
2. Diligence and Marketing Materials: Please tell us if your client is willing to search its deal files for the following transactions in the Funds and produce any due diligence, marketing materials, private placement memoranda, or other information relating to BIL's knowledge of the Funds and their operations during the relevant time period:
- 8/1/2000 Sigma subscription
 - 8/29/2001 Sentry subscription
 - 12/28/2001 Sentry subscription
 - 7/25/2002 Sentry subscription
 - 8/23/2002 Sentry subscription
 - 9/24/2002 Sentry subscription
 - 11/13/2002 Sentry redemption
 - 2/14/2003 Sentry redemption
 - 11/16/2004 Sentry redemption
 - 1/26/2005 Sentry subscription
 - 4/29/2005 Sentry subscription
 - 5/31/2005 Sentry subscription
 - 11/17/2005 Sentry redemption
 - 7/28/2006 Sentry subscription
 - 7/31/2006 Sentry subscription
 - 8/31/2006 Sentry subscription
 - 9/29/2006 Sentry subscription
 - 11/30/2006 Sentry subscription
 - 12/29/2006 Sentry subscription
 - 1/26/2007 Sentry subscription
 - 1/31/2007 Sentry subscription
 - 2/28/2007 Sentry subscription
 - 4/17/2007 Sentry redemption

- 7/25/2007 Sentry subscription
- 12/18/2007 Sigma redemption
- 8/18/2008 Sentry redemption
- 8/15/2008 Sigma redemption
- 11/19/2008 Sentry redemption

In addition, please tell us if your client is willing to provide updated responses to our interrogatories since your last set of R&Os objected to them wholesale. If your client would prefer to respond to the interrogatories by pointing us to documents in BIL's production, we are happy to consider that as an option.

Thanks,

Amy